

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Case No. 10-14377

PENNSYLVANIA ACADEMY OF MUSIC
Debtor

Chapter 11

**MOTION TO APPROVE DEBTOR'S DISCLOSURE STATEMENT, APPROVE
DEBTOR'S PLAN VOTING PROCEDURES, ESTABLISH DATES FOR
THE FILING OF OBJECTIONS TO DEBTOR'S PLAN, ESTABLISH
DATES FOR VOTING TO ACCEPT OR REJECT
THE PLAN, AND ESTABLISH THE DATE FOR THE CONFIRMATION HEARING**

Pennsylvania Academy of Music, Debtor and Debtor-in-Possession ("Debtor"), hereby moves this Court to (i) approve Debtor's Disclosure Statement; (ii) approve Debtor's Plan voting procedures, (iii) establish dates for the filing of Objections to the Debtor's Plan, (iv) establish dates for voting to accept or reject the Plan, and (v) establish the date for the Confirmation Hearing. In support thereof, the Debtor states as follows:

1. On May 27, 2010, a voluntary petition for relief under Chapter 11 was filed by Debtor.
2. Debtor continues in the possession of its assets and is in the process of liquidating its assets.
3. Debtor believes, and therefore avers, that the Disclosure Statement provides adequate information to creditors and interest holders as required by §1125 of the Bankruptcy Code and that the Plan satisfies all requirements for confirmation set forth in §1129 of the Bankruptcy Code.

WHEREFORE, the Debtor respectfully requests that this Court enter an Order approving Debtor's Disclosure Statement, approving Debtor's Plan Voting Procedures, Establishing Dates for filing of Objections to Debtor's Plan, establishing dates for Voting to Accept or Reject the Plan, and establishing the date for the Confirmation Hearing and for such other and further relief as is just.

JACQUES H. GEISENBERGER, JR., P. C.

By: /s/ Jacques H. Geisenberger, Jr.

Jacques H. Geisenberger, Jr.

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